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Hearing Date: December 3, 2008
Hearing Time: 10:00 a.m.
Objection Date: November 26, 2008

Counsel for International Business Machines Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	
)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.)	
)	Case No. 08-13555 (JMP)
Debtor,)	
)	Jointly Administered
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SECURITIES INVESTOR PROTECTION)	
CORPORATION,)	
)	
Plaintiff,)	
)	Adversary Proceeding No.
v.)	08-01420 (JMP)
LEHMAN BROTHERS INC.)	
)	
Debtor.)	

**NOTICE OF HEARING OF INTERNATIONAL BUSINESS MACHINES
CORPORATION'S MOTION FOR AN ORDER (I) COMPELLING
PAYMENT OF UNDISPUTED PORTION OF CURE AMOUNT;
(II) COMPELLING PAYMENT FOR SERVICES PROVIDED POST-
PETITION; AND (III) SCHEDULING A HEARING FOR THIS COURT TO
DETERMINE THE AMOUNT OF REMAINING DISPUTED CURE AMOUNT**

PLEASE TAKE NOTICE that, upon the annexed "International Business
Machines Corporation's Motion for an Order (I) Compelling Payment of Undisputed Portion of
Cure Amount; (II) Compelling Payment for Services Provided Post-Petition; and (III) Scheduling
a Hearing for this Court to Determine the Amount of Remaining Disputed Cure Amount" (the
"Motion"), and the exhibits annexed thereto, and all pleadings and prior proceedings had herein,

and all matters upon which this Court may take judicial notice, International Business Machines Corporation, on its own behalf and on behalf of its subsidiaries and affiliates (collectively “IBM”), will move this Court for an order compelling payment of the undisputed portion of the Cure Amount (as defined in the Sale Order), compelling payment for services provided post-petition, and scheduling a hearing to determine the amount of the remaining disputed Cure Amount, before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004, at the Omnibus Hearing scheduled for **December 3, 2008, at 10:00 a.m. (prevailing eastern time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion and the relief requested therein must be made in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Bankruptcy Court of the Southern District of New York, set forth the basis for the objection and the specific grounds therefore, and be filed with the Bankruptcy Court electronically in accordance with General Order M-242, as amended by General Order M-269, and served in accordance with the “Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures,” dated September 22, 2008 (Docket No. 285) (the “Procedures Order”) on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq., and Jacqueline Marcus, Esq.), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin, and Tracy Hope Davis); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase

Manhattan Plaza, New York, New York 10005, (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.), attorneys for the official committee of unsecured creditors appointed in these cases; (v) the attorneys for any other official committee(s) appointed in these chapter cases; (vi) Cleary Gottlieb LLP, One Liberty Plaza, New York, NY 10006, (Attn: Lindsee P. Granfield, Esq. and Lisa Schweiger, Esq.) and Sullivan & Cromwell LLP, 125 Broad Street, New York, NY 10004, (Attn: Robinson B. Lacy, Esq. and Hydee R. Feldstein, Esq.), attorneys for the Debtors' postpetition lenders; (vi) all persons and entities that have formally appeared and requested service in these cases; and (vii) upon counsel for IBM., Satterlee Stephens Burke & Burke LLP, 230 Park Avenue, New York, New York 10169 (Attn: Christopher R. Belmonte, Pamela A. Bosswick and Abigail Snow); on or before November 26, 2008.

PLEASE TAKE FURTHER NOTICE that if you do not timely file and serve a written objection to the relief requested in the Motion in accordance with this Notice and the Procedures Order, the Bankruptcy Court may deem any opposition waived, treat the Motion as conceded, and enter an order granting the relief requested in the Motion without further notice or hearing.

Dated: New York, New York
October 30, 2008

SATTERLEE STEPHENS BURKE & BURKE LLP
*Counsel for International Business Machines
Corporation*

By: /s/ Christopher R. Belmonte
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